



MEMO ENDORSED

U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 2, 2021

VIA ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 6/3/21

Re: United States v. Recio-Rondon, et al.,
20 Cr. 115 (ALC)

Dear Judge Carter:

The Government writes on behalf of the parties to request an adjournment of the upcoming status conference, currently scheduled for June 3, 2021 at 12:30 PM, and exclusion of time under the Speedy Trial Act. The Government's motion for reconsideration of the Court's order dismissing one count of the three-count Indictment is fully briefed and pending before this Court. (ECF Nos. 61-63). Consequently, there are no new issues the Government or defense counsel intend to raise with the Court at the upcoming status conference. The defendants, through counsel, have either affirmatively indicated that they are amenable to an adjournment of the status conference, or otherwise have raised no objection to the prospect of adjourning this conference. Likewise, and in light of the fact that the parties have no motions or applications to make to the Court, the Government does not oppose an adjournment until early July 2021, to provide sufficient time for the parties to discuss proposed trial dates for the fourth quarter of 2021.

Assuming the conference is rescheduled, the Government respectfully requests that the Court exclude time under the Speedy Trial Act up to the date of the next scheduled conference. 18 U.S.C. § 3161(h)(7). Exclusion of time is warranted given that there is a pending motion before the Court, and that additional time will facilitate the contemplation of any pre-trial dispositions.

[Continued]

Wherefore, the Government respectfully requests an adjournment of the parties' upcoming conference to a date in early July 2021, and exclusion of time up to the rescheduled conference date.

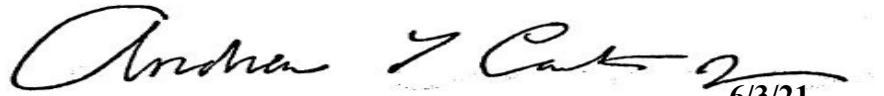
Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: /s/
Sarah Mortazavi
Jacob Gutwillig
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cc: All Counsel via ECF

The application is **GRANTED**. Status conference
adjourned to 7/13/21 at 3:30 p.m.
So Ordered.


6/3/21